

SHAFFY MOEEL (State Bar No. 238732)
MOEEL LAW OFFICE
shaffymoeel@gmail.com
1611 Telegraph Ave. Ste. 806
Oakland, CA 94612
Telephone: (415) 735-5021

Attorneys for Defendant
MARIA ALICIA TORRES GUTIERREZ

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

MARIA ALICIA TORRES GUTIERREZ,

Defendants.

Case No.: 18-CR-0458-RS

**STIPULATION AND ~~PROPOSED~~
ORDER CONTINUING STATUS
CONFERENCE AND EXCLUDING
TIME UNDER THE SPEEDY TRIAL
ACT**

This matter is presently set for a status conference on June 18, 2019. The government has produced discovery to the defendant, including wiretap recordings, pursuant to the terms of a protective order. Ms. Torres Gutierrez is currently on pretrial release and resides in the Central District of California. Ms. Gutierrez's counsel is still reviewing the discovery produced to date. In light of the pending review, the protective order's restrictions on the dissemination of that discovery, and the defendant's residence outside the district, the parties do not believe they will be in a position to provide the Court with a meaningful status update on the date currently set. For these reasons, the parties stipulate and respectfully request the Court continue the status conference from June 18, 2019 to July 16, 2019 at 2:30 p.m.

For the same reasons, the parties also stipulate that the time between June 18, 2019 and July 16, 2019, should be excluded from calculation under the Speedy Trial Act for the effective preparation

1 of counsel and that ends of justice served by any such continuance outweigh the best interests of the
2 public and the defendant in a speedy trial.

3 IT IS SO STIPULATED this 14th day of June, 2019.

4
5 MOEEL LAW OFFICE

6 /s/ _____

7 SHAFFY MOEEL

8 Attorney for Maria Alicia Torres Gutierrez

9 DAVID L. ANDERSON

10 United States Attorney

11 /s/ _____

12 NIKHIL BHAGAT

13 Assistant United States Attorney

14 Attorneys for the United States

1 **~~PROPOSED~~ ORDER**

2 For good cause shown, with respect to defendant Maria Alicia Torres-Gutierrez, the status
3 conference hearing presently set for June 18, 2019 at 2:30 p.m. is continued to July 16, 2019 at 2:30
4 p.m. Based upon the stipulation of counsel and for good cause shown, the Court finds that failing to
5 exclude the time between June 18, 2019, and July 16, 2019 would deny counsel the reasonable time
6 necessary for effective preparation, taking into account the exercise of due diligence. 18 U.S.C. §
7 3161(h)(7)(B)(iv). The Court further finds that the ends of justice served by excluding the time from
8 June 18, 2019 through and including July 16, 2019, from computation under the Speedy Trial Act
9 outweigh the best interests of the public and the defendants in a speedy trial. Having made these
10 findings, it is hereby **ORDERED** that the time from June 18, 2019 through and including July 16,
11 2019, shall be excluded from computation under the Speedy Trial Act as to this defendant. 18 U.S.C.
12 § 3161(h)(7)(B)(iv).

13 PURSUANT TO STIPULATION, IT IS SO ORDERED this 17th day of June, 2019.

14 
15 THE HONORABLE RICHARD SEEBORG
16 UNITED STATES DISTRICT JUDGE
17
18
19
20
21
22
23
24
25
26
27
28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28